

# EXHIBIT D

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*Proposed Attorneys for Plaintiffs (Debtors  
and Debtors in Possession)*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**- and -**

**PACIFIC GAS & ELECTRIC  
COMPANY,**

**Debtors.**

Case Nos. 19-30088 (DM)  
19-30089 (DM)

Adv. Pro. No. 19-03006 (DM)

**PG&E CORPORATION,  
PACIFIC GAS & ELECTRIC  
COMPANY,**

**Plaintiffs,**

**v.**

**PUBLIC EMPLOYEES  
RETIREMENT ASSOCIATION OF  
NEW MEXICO, et al.**

**Defendants.**

**STIPULATION AND AGREEMENT FOR  
ORDER REGARDING SCHEDULING  
ONLY AS TO PUBLIC EMPLOYEES  
RETIREMENT ASSOCIATION OF NEW  
MEXICO**

[No Hearing Requested]

1 This stipulation and agreement for order ("**Stipulation and Agreement for Order**") is  
2 entered into by and between PG&E Corporation ("**PG&E Corp.**") and Pacific Gas and Electric  
3 Company (the "**Utility**"), as debtors and debtors in possession (collectively, the "**Debtors**") in the  
4 above-captioned Chapter 11 cases, and as Plaintiffs in the above-captioned adversary proceeding  
5 (the "**Adversary Proceeding**"), on the one hand, and Public Employees Retirement Association  
6 of New Mexico ("**PERA**"), on the other hand. The Debtors and PERA are referred to in this  
7 Stipulation and Agreement for Order collectively as the "Parties," and each as a "Party." The  
8 Parties hereby stipulate and agree as follows:

9 **RECITALS**

10 A. On February 15, 2019, the Debtors commenced the above-captioned adversary  
11 proceeding (the "**Adversary Proceeding**") by filing Debtors' Complaint for Preliminary and  
12 Permanent Injunctive Relief as to Actions against Non-Debtors [Adv. Docket No. 1] (the  
13 "**Complaint**").

14 B. On February 15, 2019, the Debtors filed Debtors' Motion for Preliminary Injunction  
15 as to Actions against Non-Debtors [Adv. Docket No. 2] (the "**PI Motion**").

16 C. On February 19, 2019, this Court issued a Summons and Notice of Scheduling  
17 Conference in the Adversary Proceeding [Adv. Docket No. 4] (the "**Summons**"). The Summons set  
18 a scheduling conference in the Adversary Proceeding (the "**Scheduling Conference**") for April 24,  
19 2019, at 9:30 AM PST.

20 D. On February 19, 2019, this Court issued an Order Re Initial Disclosures and  
21 Discovery Conference [Adv. Docket No. 5] (the "**Discovery Order**").

22 E. On February 20, 2019, the Debtors noticed the PI Motion for hearing on March 27,  
23 2019, at 9:30 AM PST (the "**March 27 Hearing**") [Adv. Docket No. 6].

24 F. On March 20, 2019, the Debtors filed a Reply Memorandum of Points and  
25 Authorities in Further Support of Debtors' Motion for Preliminary Injunction as to Actions against  
26 Non-Debtors [Adv. Docket No. 18], in which Debtors noted that they were "engaged in procedural  
27  
28

1 and other discussions” with PERA, and did not plan to proceed with their PI Motion as against  
2 PERA at the March 27 Hearing.

3 G. The Discovery Order requires that the Parties conduct a discovery conference (the  
4 “**Discovery Conference**”) at least 21 calendar days before the Scheduling Conference, *i.e.*, by April  
5 3, 2019. The Discovery Order further requires that the Parties make initial disclosures (the “**Initial**  
6 **Disclosures**”) and file a written discovery plan (the “**Discovery Plan**”) within fourteen (14) days of  
7 the Discovery Conference.

8 H. The Parties’ “procedural and other discussions” are ongoing, and they plan to submit  
9 a stipulation regarding the Debtors’ prosecution of the Complaint and PI Motion as against PERA as  
10 soon as possible.

11 I. The Parties agree that the Scheduling Conference shall be adjourned without date,  
12 and that the Parties’ deadlines for the Discovery Conference, Initial Disclosures, and Discovery Plan  
13 shall be continued indefinitely, subject to the anticipated stipulation.

14 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
15 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
16 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
17 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**  
18 **THAT:**

- 19 1. The Scheduling Conference shall be adjourned without date.
- 20 2. The Parties’ deadlines to conduct the Discovery Conference, make Initial  
21 Disclosures, and file a Discovery Plan shall be continued indefinitely.
- 22 3. If either Party, at any time, wishes to reset the Scheduling Conference, that  
23 Party may request a meet-and-confer (the “**Meet-and-Confer**”) with the other Party to attempt to  
24 agree as to a date on which to reset the Scheduling Conference; pursuant to the Discovery Order, that  
25 date shall provide the basis for the Parties’ deadlines to conduct the Discovery Conference, make  
26 Initial Disclosures, and file a Discovery Plan. The Meet-and-Confer must take place within five (5)  
27 days of the requesting Party’s initial request to the other Party to conduct the Meet-and-Confer.
- 28 4. If the Parties cannot reach agreement as to a date on which to reset the  
Scheduling Conference within five (5) days of the Meet-and-Confer, any Party shall have the right to

request that this Court hold a status conference, on ten (10) days' notice, at which all Parties may be heard regarding the date on which to reset the Scheduling Conference.

Dated: April 3, 2019

Dated: April 3, 2019

KELLER & BENVENUTTI LLP

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